## IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF MISSISSIPPI NORTHERN DIVISION

UNITED STATES OF AMERICA,	
PLAINTIFF,	) )
V.	) ) Case No.: 3:16-cv-00489-CWR-RHWR )
HINDS COUNTY, ET AL.,	) )
DEFENDANTS.	) )

## UNITED STATES' MOTION IN LIMINE FOR ADMISSION OF MONITORING REPORTS

The United States, by and through its undersigned counsel, hereby files its motion *in limine* for admission of the Monitoring Reports of the Court-appointed Monitor, Elizabeth E. Simpson, at the anticipated evidentiary hearing on the Order to Show Cause and Defendants' Motion to Terminate or, Alternatively, Modify the Consent Decree. *See* Order to Show Cause, Nov. 23, 2021, ECF No. 100; Order, Jan. 10, 2022, ECF No. 107; Defs.' Motion to Terminate or, Alternatively, Modify Consent Decree, Jan. 21, 2022, ECF No. 111 ("Motion to Terminate"). The parties have conferred in an attempt to reach agreement as to a stipulation to the Monitoring Reports, but have not been able to reach agreement. The Monitoring Reports constitute highly relevant evidence and are critical to an efficient and fair resolution of the Order to Show Cause and the Motion to Terminate. In support of this motion, the United States submits the accompanying Memorandum in Support of the Motion *in Limine* for Admission of Monitoring Reports.

Respectfully Submitted,

## FOR THE UNITED STATES:

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United States Department of Justice Civil Rights Division Special Litigation Section 150 M St., N.E. Washington, DC 20002 DATED: February 1, 2022

## **CERTIFICATE OF SERVICE**

I hereby certify that on February 1, 2022, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which sent notification of such filing to all counsel of record.

/s/Christopher N. Cheng

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